

State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining JOHN R. BAZA Division Director

May 13, 2015

Michael B. Toelle Holcim (U.S.), Inc 6055 East Croydon Road Morgan, Utah 84050

Subject: Fifth Review of Notice of Intention to Commence Large Mining Operations, Holcim (U.S.) Inc.,

Devils Slide Quarry, M/029/0001, Morgan County, Utah

Dear Mr. Toelle:

The Division of Oil, gas and Mining has completed a review of the Notice of Intention to Commence Large Mining Operations (NOI) for the Devil's Slide Mine, which was received April 9, 2015. The attached comments will need to be addressed before tentative approval may be granted.

It is very difficult to review much of the NOI until maps are complete. To this end, the Division looks forward to a meeting on May 18, 2015, to address inconsistencies in the maps, rule R647-105. After the maps are deemed to be "complete", the Division will further review those items submitted under rule R647-4-106. In the attached review comments, applicable older comments from June 10, 2011, have been carried forward to this review document.

The comments are listed under the applicable Minerals Rule heading; please format your response in a similar fashion. Please address those items requested in the attached technical review and submit the NOI as a complete document using redline and strikeout text. After the notice is determined technically complete and the Division is prepared to issue final approval, you will be asked to submit two clean copies of the complete and corrected plan. Upon final approval of the permit, the Division will stamp both copies approved and return one for your records.

The Division will suspend further review of the NOI until receiving your response to this letter. Please contact Leslie Heppler at 801-538-5257 or me at 801-538-5261 if you have questions about the review. Thank you for your cooperation in completing this permitting action.

Paul B. Baker

Minerals Program Manager

PBB: lah: eb Attachment: Review

cc: Larry Garahana and Stephen Allen, BLM SLFO (lgarahana@blm.gov, sallen@blm.gov) P:\GROUPS\MINERALS\WP\M029-Morgan\M0290001-DevilsSlide\final\REV5-6578-04222015.doc



Fifth REVIEW OF NOTICEOF INTENTION TO COMMENCE LARGE MINING OPERATIONS

Holcim (US) Inc. Devil's Slide Mine M/029/0001 May 12, 2015

General Comments:

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
New 1	General	Submittal should be formatted to easily incorporate additional revisions and amendments. No additional reply needed	lah	Transaction of the Control of the Co
New 2	General	The Division may have additional comments based on future submittals. Every attempt should be made by the Operator to submit a complete NOI.	lah	
New 3	General	In the reply to this review, please show where each comments has been addressed.	lah	
New 4	General	From the Division's June 16, 2011, review - Please use consistent units, not both metric and English. The standard in the US is English; please convert all units to English. (English slope units are H:V.) This is still on ongoing problem; please review the entire document and use	lah lah	
		*H:*V.		
New 5		The plan received is incomplete. Both Appendix 2, the Chemical and Toxicity Analysis of Kiln Dust, and Appendix 4, Holcim (US) Devils Slide Quarry Interim Drainage Study, were deleted from the NOI.	lah	
New 6	Page 1	Please show the locations of Quarries 1, 2 and 3 on a map. Include a brief description of each as it relates to reclamation.	lah	

R647-4-104 - Operator's, Surface and Mineral Ownership

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
New 7	Omission	From the Division's June 16, 2011, review - Submit a mineral and surface ownership map and include ownership of adjacent property.	lah	
		Please submit the address for Joseph Toone.	lah	

R647-4-105 - Maps, Drawings & Photographs

General Map Comments

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
Old Comment	Figure 1	Figure 1 is included but not listed in the Appendix. Please list in the appendix and refer to the drawing under appropriate sections, including the surety section.	lah	

Page 3 of 11 Michael Toelle M/029/0001 May 13, 2015

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
Old Comment	All Maps	From the Division's June 16, 2011, review- The majority of the maps are difficult to read. Most scales are incorrect. Much of what is noted in legend doesn't appear on the map. Please correct all maps and delete parts of the legend that are not correct. Increase the font size on drawings so the text is legible. Please use Bar Scales based on standard engineering scales.	lah	
Old Comment		The Division suggests a meeting to discuss the best and most cost effective formats for the maps.	pbb	
Old Comment	All Maps	Please update maps to be current. Many maps are over 10 years old and do not show the current status or revised planned operations. An updated current status map should be included with the annual progress report.	mpb	
Old Comment	All Maps	Maps are mislabeled. Maps listed in text are out of sequence with labels on each map. Example – Maps under section 105.2 text are labeled as "105.3, 105.4, 105.4a, 105.4b."	lah	

105.1 - Topographic base map, boundaries

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
Old Comment	Map 105.1	As with all maps, the map is difficult to read. The scale is shown as 1"=2000'. Much of what is noted in legend doesn't appear on the map. Please correct the map and delete parts of the legend that are not correct, zoom in on the property and include labels from USGS map.	lah	
Old Comment	Map 105.2		lah	

105.2 - Surface facilities map

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
Old Comment	Text page 6	Figure 105.3 is not included in the NOI, but is included in a confidential section and not noted in the text as a confidential document. Please note in the text the location of all figures. As per rule the nature and size of the ore body can be confidential. This figure is critical for bonding and does not appear to have anything that needs to be kept confidential.	lah	
Old Comment	Figure 105.3	Once again, it does not appear this figure meets the criteria for holding it confidential. Information about surface facilities is critical for bonding purposes, and these facilities can be seen on aerial photos available through many sources on the Internet. The scale shown as 1"=100' appears to be wrong as parking stalls are not five feet wide. Much of what is noted in the legend doesn't appear on this map. The Division needs an accounting of all facilities that is consistent with the map. There are many other maps noted in the legend that should be deleted as they are not part of the Division's NOI. Facilities should be labeled as in the legend A,B,C etc. Utilities appear to be wrong.	lah	

Page 4 of 11 Michael Toelle M/029/0001 May 13, 2015

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
Old Comment	Figure 105.3	Drill holes are shown on the maps but not numbered. The Division needs an accounting of what drill holes need to be plugged and how much it would cost (depth and diameter). Ideally, the plan should include a table that is tied to the figure and the bond calculation.	lah	
Old Comment	Figure 105.3 – large map	Many of the general comments listed above apply, but the scale appears to be correct. Main corrections needed are the drill data, fix the legend, and remove drawing numbers for the items, if the drawings are not included in the NOI.	lah	
Old Comment	Figure 105.4	As per rule, the nature and size of the ore body can be confidential. This figure is of surface facilities, is critical for bonding should not be considered confidential. The scale is shown as 1"=500' and appears to be wrong as the paved roads are not ten feet wide. Much of what is noted in the legend doesn't appear on this map. The Division needs an accounting of all facilities that is consistent with the map. There are many other maps noted in the legend that need to be deleted as they are not part of the Division's NOI. Facilities should be labeled as in the legend A,B,C etc. Utilities appear to be wrong.	lah	
Old Comment	Figure 105.4	Drill holes shown on the maps can't be read because of the scale of the map. The Division needs an accounting of what drill holes need to be plugged and how much it would cost (depth and diameter), so a table that is tied to the figure and the bond calculation would be ideal.	lah	
Old Comment	Figure 105.4	Map includes postmining reclamation treatments. This clutters up the map showing surface facilities. Please put these CAD layers on a separate map clearly defining what is to be reclaimed in the future.	lah	
Old Comment	Figure 105.4 – large map	This map was not stamped as confidential, and many of the comments in 19-21 above apply to this map also.	lah	
New 8	Figure 105.4	Please show the locations of current and past cement kiln dust disposal locations and stockpiles. Is the "processed waste facility" identified on the figure 105.4d the same as the cement kiln dust storage area? If so, modify the name to be clear.	pnb	

105.3 - Drawings or Cross Sections (slopes, roads, pads, etc.)

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
Old Comment	Omission	From the Division's June 16, 2011, review - Please include a geologic map. Please color the portion of the map that applies to the mine, include portion of legend that applies to the mine.	lah	
Old Comment	Figure 105.4a	All 3 scales on the map are different. Please complete the legend.	lah	
Old Comment	Figure 105.4a – Large map	All 3 scales on the map are different. Please complete the legend.	lah	
Old Comment	Figure 105.4b	The figure and the bar scale are at the same scale, but they are different than the scale noted in the title block. The legend is not complete. The legend notes a fracture zone for lithologic contact.	lah	

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
Old Comment	Figure 105.4c	The figure and the bar scale are at the same scale, but they are different than the scale noted in the title block. The legend is missing. Note the green, blue and black patterns; some printing in yellow on the left edge is illegible; note the original ground surface and maximum slope angles.	lah	
Old Comment	Figure 105.4c – large map	The figure and the bar scale are at the same scale, but they are different than the scale noted in the title block. Please complete the legend. Note green, blue and black patterns; some printing in yellow on left edge can't be read; note the original ground surface and maximum slope angles. The horizontal scale is illegible — Please increase the font size.	lah	
Old Comment	Page 7	Figure 105.5 is not included in the NOI but is included in a confidential section and not noted in the text as a confidential document. Please note the location of all figures in the text. As per rule the nature and size of the ore body can be confidential. The Division prefers that maps are not labeled as confidential.	lah	
Old Comment	Figure 105.5 & Highwall slope design	As shown this map really doesn't add anything to the plan. Please explain why this map is included. The next figure which is listed as Highwall Slope Design has actual design data, yet it doesn't show both pits. Toe to crest angles need to be listed on the cross sections.	lah	
Old Comment	Figure 105.5 – large map	As shown this map really doesn't add anything to the plan. Please explain why this map is included. The legend is incorrect – the line around the highwall is listed as a fault. There is a bit of geology included, but it isn't complete.	lah	
Old Comment	Page 7	Figure 105.5a is not included in the NOI, nor in confidential pages, and it is not noted in the text as a confidential document. Text on page 7 notes 105.5a is highwall, but it is missing.	lah	
Old Comment	Figure 105.5b – both maps	Figure is called Typical Quarry Sections. The Division needs to know which cross sections are for operations and which are for reclamation. Use H:V and not Rise:Run and be consistent with the geotechnical report. Add scale to drawing or note all dimensions on the diagram. Add toe to crest angle. It is not clear if all the highwalls (east, west and north) will have the same angle.	lah	
Old Comment	Figure 105.6	No problem for scale and it appears the scale might be ideal for other figures. Legend should include more basic detail, such as a statement that an area will be top soiled and seeded or ripped and seeded.	lah	
Old Comment	Figure 105.5 – large map	Scale is wrong: as shown 1" is not 1 inch. Legend should include more basic detail as discussed above.	lah	
Old Comment	Figure 105.5a – Large map	Scale is incorrect: as shown 1" is not 1 inch. Neither the current topography nor the final topography is confidential.	lah	
Old Comment	Figure 105.5c – Large map	Scale is incorrect: as shown 1" is not 1 inch. Water and streams are shown on the legend, but not shown on the map. Neither the current topography nor the final topography is confidential.	lah	
Old Comment	Map 105.6a	Scale is incorrect: as shown 1" is not 1 inch. Legend does not match the map.	lah	
Old Comment	large mapMap 105.6alarge map	Reclamation is not confidential. Scale is incorrect: as shown 1" is not 1 inch. As shown finished pits drain toward the river and not toward the back of the pit. Please revise to limit run off.	lah	

Page 6 of 11 Michael Toelle M/029/0001 May 13, 2015

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
New 9	Figure 105.6	Show the current and past disposal locations of cement kiln dust on the reclamation treatment map(s), as required by R647.4.110.4.	pnb	Account 16, 200 are also print 10, 300 areas assessed
Old Comment	Map 109.1	Scale is incorrect; legend doesn't match symbols on the map. Please correct.	lah	
Old Comment	Map DCC- 1597, DCC- 1338-97, Geology Map, DCC-1581, & DCC-1340-3	These maps are in the binder but not shown under the Lists of Figures or referenced in the body of the text. Please add to list of figures and note that they are from the previous permit. These maps are for reference only and they were not reviewed for correctness.	lah	

R647-4-106 - Operation Plan

General Operation Comments

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
Old Comment	General	Numerous times throughout section 106, the NOI refers to previous plans. Please copy appropriate information and include in the NOI. This needs to be a standalone document.	lah	and Andrews of the Control of the Co

106.1 - Minerals mined

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
Old Comment	Page 9	The Division understands the shale layers are also mined to make the Portland Cement.	lah	

106.2 - Type of operations conducted, mining method, processing etc.

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
Old Comment	Page 10 para 3	The plan says quarries 1, 2 and 3 are shown, yet only 2 pits are shown and nothing is labeled on Figure 105.5.	lah	
Old Comment	Page 10 Para 3	There is no figure labeled as "Final Mine Plan Design for Quarries 172" as written.	lah	
Old Comment	Page 10 Para 4	As written "2v:1h" then "3V:1H", please be consistent and follow Slope Stability Report. Use English Units	lah	
Old Comment	Page 10 Para 4	No variance has been approved at this time for the 2002 reclamation plan. Please reword.	lah	
Old Comment	Page 10 Para 5	The small sandstone pit needs to be included in cross sections and post mining reclamation.	lah	
New 10	Page 11, Omission	Based on the chemical analysis provided, it appears that kiln dust should be classified as deleterious. Please modify this section of the NOI accordingly. Consider the results of additional testing in order to verify this conclusion.	pnb	
New 11	Page 11, Omission	Identify other deleterious materials (such as fuels and other chemicals) that are or will be present in significant amounts. Deleterious materials would likely produce chemical or physical conditions in the soils or water that are detrimental to the biota or hydrologic systems.	pnb	

106.3 - Estimated acreages disturbed, reclaimed, annually

Page 7 of 11 Michael Toelle M/029/0001 May 13, 2015

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
Old Comment	Omission	Nothing is written, about any reclamation to be done annually. If it is the intent of the operator, not to do any reclamation until mining is complete, please include a sentence to that effect in the NOI.	lah	

106.4 - Nature of materials to be mined or processed including waste; estimated annual tonnages

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
New 12	106.4, Omission	Describe the nature of the cement kiln dust, and refer to Appendix 2. Discuss briefly the origin and location of the 2004 cement kiln dust sample, and the significance of the results of testing reported in Appendix 2.	pnb	
New 13	106.4, Omission	Indicate whether this cement plant also incinerates (or has incinerated) hazardous waste or waste that would increase organic contaminants in the kiln dust. Alternatively, please include a commitment to test for organic compounds that might result from incinerating organic compounds or hazardous wastes.	pnb	
New 15	106.4, Omission	Based on the results in Appendix 2 and general cement kiln dust characteristics, the Division currently considers these materials to be deleterious. In order to be more certain, please provide the results of additional elemental and SPLP leach analyses (or TCLP analyses) from statistically adequate samples of cement kiln dust that are representative of current and, if possible, future production. Include the same metals as previously analyzed, and add TDS to the list of SPLP analytes. Provide the additional test results in Appendix 2.	pnb	
New 16	Page 15, para 4	Provide additional information about the level of nitrates in the high nitrate soils affected by blasting, and approximate volumes of affected soils and any storage or mitigation actions that may be necessary to prevent water contamination.	pnb	

106.7 – Existing Vegetation – species and amount

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
Old Comment	Omission	The NOI references Appendix 7, but in Appendix 7, it is listed as confidential. The Division has not been able to find this information within the confidential section of the plan.	lah	

106.8 - Depth to groundwater, extent of overburden, geology

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
Old Comment	17	Discuss in the text the elevation of the ground water in the water well and the proposed pit. Groundwater was noted during an inspection.	lah	
Old Comment	18	There is no discussion on the extent of the overburden or geology. Please add the geology from the 1987 reclamation plan into the current NOI. Refer to the geology map (which has yet to be submitted).	lah	

106.9 - Location & size of ore, waste, tailings, ponds

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
Old Comment	Page 18, Para 2	As per rule, the nature and size of the ore body can be confidential. The analysis in Appendix 2 cannot be kept confidential. Please move to the main appendix.	lah	Seed of the control o

Page 8 of 11 Michael Toelle M/029/0001 May 13, 2015

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
Old Comment	Page 18, para 2	Please include a brief narrative on how the kiln dust stockpiles (past and present) are monitored for discharge.	lah	
Old Comment	Page 18 Para 6	As per rule, the nature and size of the ore body can be confidential. The BMP's in Appendix 4, cannot be kept confidential. Please move to the main appendix.	lah	
New 17	Page 19, para 3	Report the approximate volume of cement kiln dust disposed of in the Bone Yard Hollow area in the past, and also the maximum volume of cement kiln dust that would be stored in the active cement kiln dust stockpile area.	pnb	
New 18	Page 19, para 3	Indicate whether there is a liner under the kiln dust stockpile and dump.	pnb	

R647-4-109 - Impact Assessment

109.1 - Impacts to surface & groundwater systems

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
New 19	Appendix 9	The SWPPP included in Appendix 9 is expired and obsolete. It also only covered the plant area. Please provide updated and current SWPPP's for both the plant and the mine areas. Providing updated and current SWPPP's may provide the information requested in some of the following comments in this section.	mpb	
New 20	Fig. 109.1	This figure is 10 years old. Please provide a current map showing the catch basins and other runoff management measures. An updated SWPPP should include these figures.	mpb	
New 21	Fig. 109.1	There are French drains shown as text on the figure, but they are not drawn as features. Are these still present on site? If so, the updated Figure 109.1 should show these, and provide design details for them.	mpb	
		Please show the cement kiln fines location as well.	pnb	
New 22	Fig. 109.1	On all maps, please identify the Weber River and affected tributaries.	mpb	

109.4 - Slope stability, erosion control, air quality, safety

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
New 23	Page 33	The slope stability section needs to follow the recommendations in Appendix 8.	lah	Annual Committee

109.5 - Actions to mitigate any impacts

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
New 24	Omission	From the Division's June 16, 2011, review - Please include the operator's actions to mitigate any impacts (109.1 – 109.4).	lah	
		Please include specific actions for each section (109.1 – 109.4).	lah	

R647-4-110 - Reclamation Plan

110 - General

Page 9 of 11 Michael Toelle M/029/0001 May 13, 2015

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
New 25	Attachment 6	The Reclamation Plan map identified as Attachment 6 is nearly 30 years old. Please provide an updated Reclamation Plan that includes final topography, drainage controls, restored drainages, reclamation treatments and any other information required in R647-4-105.3.17. Please rename the map from "Attachment 6" to something consistent with the rest of the figures and maps in the NOI (Figure 110a or similar). If necessary, provide two figures to show the required reclamation information.	mpb	

110.2 - Roads, highwalls, slopes, drainages, pits, etc., reclaimed

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
New 26	Page 37 Para 1	From the Division's June 16, 2011, review - Please show on reclamation maps the minor access road to be left.	lah	
		This has not been done.	lah	
New 27	Page 37 Para 2	From the Division's June 16, 2011, review - The Division can't locate Exhibit 105.6 but can find Figure 105.6. Figure 105.6 is very generalized and needs more detail.	lah	
		Holcim comment notes "there is no Exhibit 105.6." On the list of figures the "Reclamation Treatment" map is noted as 105.6. This is a critical map. Please submit the reclamation treatment map.	lah	
New28	Page 37 Para 5 & 6	From the Division's June 16, 2011, review - As per comment #5 listed above, the two paragraphs alternate between English and metric units and one notes 2V:1H and then 2H:1V. Please correct.	lah	
		As per the rest of the NOI use English units, such as 1H:2V.	lah	
New 29	Page 37 Para 5 & 6	Show on reclamation map the benches that are proposed to be reclaimed and to be seeded.	lah	
		Holcim response - See figure 105.5c. No treatment is shown on map 105.5c, and the topographic contours do no match the geotech report.	lah	
New 30	Page 38, Waste Dumps	Identify whether additional cement kiln dust waste dumps will be disposed of. Identify reclamation plans for any future kiln dust dumps. It isn't clear if the Stockpiles section applies to marketable kiln dust piles or not.	pnb	

110.3 - Description of facilities to be left (post mining use)

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
New 31	Page 39	From the Division's June 16, 2011, review - As noted above, any road or pond to be left at the request of the private landowner needs to be documented and shown on the reclamation map.	lah	
		The comment from Holcim says to see Figure 109.1, but no private landowner's roads are shown on Figure 109.1	lah	

110.4 - Description or treatment/disposition of deleterious or acid forming material

Page 10 of 11 Michael Toelle M/029/0001 May 13, 2015

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
New 32	Page 40	From the Division's June 16, 2011, review - Bonding is based on worse case conditions; please list the maximum amount of deleterious materials. Also list fuels and other petroleum products used at the site.	lah	
New 33	Page 40	Update this section to address both active (product) and any waste kiln dust piles, and refer to the Reclamation Treatments map to show the location of deleterious materials. How will kiln dust be " safely removed from the site or left in an isolated or neutralized condition such that adverse environmental effects are eliminated or controlled" (R647-4-111.4)?	pnb	
New 34	Page 40	Identify plans for removal of other deleterious materials listed in section 106.2.	pnb	

R647-4-112 - Variance

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
New 35	All of section page 45-49	From the Division's June 16, 2011, review - As written the sections conflict. A slope stability variance will be granted when the geotech of record provides an adequate geotechnical report that is stamped and provides clear recommendations.	lah	
		Sections still conflicts, but the geotechnical report has clear recommendations. Please follow the recommendations of the Engineer of record.	lah	
New 36		From the Division's June 16, 2011, review - The geotech of record needs to rewrite the paragraph on the justification. "Because it has been stable" is not justification. Stability analysis has been done and has been stamped. Present a summary of the report in the text.	lah	
	Pages 45 thru 49	Please present a summary of the current Geotech report under section 112 which would include recommendations and slope angles in English units	lah	

R647-4-113 - Surety

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
New 37	Appendix 3	From the Division's June 16, 2011, review - Please use the Division's spreadsheets to compute the reclamation cost estimate. The spreadsheets are available at the Division's webpage. Please provide the Summary sheet with the indirect costs from the Division's web page. Add Total Acres to the Summary sheet	whw	
New 38	Reclamatio n cost estimate	The Division will have further comments about the reclamation cost estimate after receiving adequate responses to the comments in this review.	pbb	
New 39	Page 50	Please provide a delegation of authority document signed by a person authorized to bind the company	lah	

Page 11 of 11 Michael Toelle M/029/0001 May 13, 2015

Appendix

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
New 40	Appendix 3	Add costs to remove or properly dispose of (such as adequately cover) cement kiln dust stockpiles that may remain on-site after mining.	pnb	
New 41	Appendix 8 Page viii	From the Division's June 16, 2011, review- Executive summary needs to include recommendations by the designer of record with FOS. Several places in the report, including but not limited to page 1, para 4 ("specified by DOGM"); page 32, para 1("required"); page 60 #17 as per DOGM review, indicate ththe Division has "required a certain factor of safety." Rule 647 does not require any FOS, but the requesting of the variance requires justification for adequate stability. Please rewrite text to reflect rule.	lah	
New 42	Appendix 8 General Comment		lah	
New 43	Appendix 8 Page 40	From the Division's June 16, 2011, review- Figure 6 should be included in the NOI, showing maximum OA for each orientation of slope. Figure 1 should be added to the NOI.	lah	
New 44	Appendix 8	Geotech report only covers Interim Quarry 3 slopes. A discussion is needed on the other quarries.		